KPS CONSULTING

"Building an Access Bridge in Technology and Telecommunications"

3508 Albemarle Street, NW
Washington, DC 20008
202.363.5599
kpsconsulting@starpower.net

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By electronic mail

Ms. Monica Desai
Ms. Michelle Carey
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: E-911 Access via Video Relay Services

Dear Ms. Desai and Ms. Carey:

When I met with each of you individually last week, we discussed whether the Commission's May 2005 ruling on the provision of E911 services by VoIP providers warrants a follow-up notice with respect to the provision of emergency services through VRS. After discussing this with one of our chief engineers, Mark Ekse, CSD agrees that there are enough novel questions regarding the provision of emergency service via VRS to warrant an FCC notice designed to garner additional guidance on this issue. Specifically, there are several issues which create distinctions between VRS and traditional (TTY based) TRS, as well as between VRS and VOIP services, to support further exploration of this issue before a mandate is put into place. These distinctions may also support the need for an industry-wide group or government-industry working group to develop a detailed implementation plan for providing 911 services as part of VRS.

Examples of some, though not all, of the issues that need to be resolved prior to a meaningful launch of 911 service through VRS include:

1) **Registry of Users**. Nominally, this registry would contain address information associated with the user as part of a "user profile." There are two ways to create a registry – either jointly across all providers or by individual provider. Either option raises issues:

a) If there is a single registry, the FCC needs to determine how each of the providers will access the registry, as well as who will be responsible for the maintenance and availability of the registry.

b) If each VRS provider has its own registry, when a user needs to utilize an alternate provider for an emergency situation, either due to long queue times, hours of operation, or technical difficulties, the user may not have a profile established with the alternate provider. For the immediate future, it is not clear how this consumer's call would be handled. In the distant future, this may also prevent an "automated" connection of the call to an appropriate PSAP.

2) Technical Standardization. Currently, each provider develops its products under a broad array of technical standards or even on a proprietary basis. Providers may currently pick-and-chose what technical platforms they wish to support – for example, desktop units, PCs, Macintosh, etc. If each provider needs to be able to provide 911 service for any user and any user device, then at least some minimum default standard for video compression, session initiation and management protocols will need to be established.

3) Validation of Location. Some VRS users are mobile (or nomadic) users – that is, they use the same hardware in multiple locations. For example, a user may have a video camera connected to his laptop and use the same account for his VRS communication wherever he is (home, office, motel during travel, etc.).

a) Will these users need to create and use multiple profiles dependent upon their location?

b) Will the VRS interpreter be permitted to confirm a user's current location through dialogue prior to connection to a PSAP?

c) The present mandate for emergency calls made via VRS is set to expire in January 2006, after which the existing TRS mandates for emergency calls are set to kick in. However, these mandates require the automatic referral and identification notification of incoming TRS calls to PSAPs. If this requirement goes into effect as scheduled, this might prematurely impose a greater standard on VRS providers than is required of VoIP providers.

4) Audio Channel. In a conventional TTY-based TRS model, an audio channel is not directly available between the consumer and the PSAP. However in a VoIP setting, this is available. PSAPs occasionally use

the audio channel to help provide information for pin-pointing the user location, as well as for providing important safety-related information to the first responders. In an emergency setting, does an audio channel need to be supported and passed to the PSAP in a voice carryover configuration?

5) **Queue Priority**. If there is no a priori indication of an emergency situation passed to the VRS provider's platform by the user equipment, emergency calls will be processed through the queue on a first-come first-served fashion. CSD has opposed allowing consumers to self-identify emergencies, as we believe this could result in misuse of the VRS. Instead, we have pushed for shorter answer times that will virtually eliminate queues. The FCC has yet to issue a ruling on whether reprioritization is permissible, and if so, whether there will be any criteria for reprioritizing VRS emergency calls.

This list is by no means exclusive; rather it is just a start for identifying some of the issues that VRS providers may have to confront when trying to handle emergency calls. Similar issues apply to text-based relay services that travel over the Internet. We welcome the opportunity to discuss these with you, and, if necessary, to put you in touch with one of our engineers. Thank you for giving us the opportunity to share our views on this matter.

Sincerely,

Karen Peltz Strauss

Legal Consultant
Communication Service for the Deaf

cc: Jay Keithley
Thomas Chandler